

Sunset Public Hearing Questions for  
**Consumer Advocate Division, Office of the Attorney General**  
Created by Section 65-3-118, *Tennessee Code Annotated*  
(Sunset termination June 2017)

1. Provide a brief introduction to the Consumer Advocate Division, Office of the Attorney General, including information about its mission, purpose, organization and statutory responsibilities.

**AG Response:**

The General Assembly established the Consumer Advocate Division (“CAD”) in 1994 to represent and provide a voice for the interests of Tennessee consumers of investor-owned utilities (also known as “public utilities”) before the Tennessee Regulatory Authority (“TRA”), or any other administrative, legislative, or judicial body. Generally, the CAD seeks to act as an advocate for Tennessee consumers before the TRA, to enforce laws applicable to public utilities, and to remove barriers to competition in public utilities markets. The relevant public utilities include electric, natural gas, telephone, water, and sewer companies. As part of the CAD’s advocacy work, CAD staff will work with Tennessee utilities to better understand their interests and will attend industry conferences and meetings to stay up to date on industry trends. The types of cases that the CAD handles are described in Response 5.

By statute, the CAD is within the Attorney General’s Office. The CAD’s organizational structure within the Attorney General’s Office is described in Response 4.

2. What were the division’s revenues (by source) and expenditures (by object) for fiscal year 2015 and to date in fiscal year 2016?

**AG Response:**

The CAD does not generate revenues. Rather, the CAD generates direct customer savings for Tennessee citizens by ensuring that the utility rates that the TRA ultimately approves are fair and equitable to Tennessee customers. Customer savings are described in Response 14. See the attached chart for expenditures (Exhibit 1). Please note that the current fiscal year expenditures are only available through April 2016.

The CAD has received a substantially similar appropriation each fiscal year. Appropriated funds that are not actually expended are returned to the State’s General Fund.

3. How does the division ensure that its staff is operating in an impartial manner and that there are no conflicts of interest? If the division operates under a formal conflict of interest policy, please attach a copy of that policy.

**AG Response:**

The CAD's statutory mandate requires that the CAD act in favor of Tennessee consumers and its staff operates in accordance with that mandate. The CAD nonetheless speaks regularly with utilities' counsel and the TRA to receive their perspectives. The CAD also contracts with qualified third-party experts to receive their objective opinions regarding the reasonableness of proposed rate increases. The CAD adheres to the conflict-of-interest policy that applies to the Attorney General's Office and the Tennessee Rules of Professional Conduct for licensed attorneys.

4. Provide a brief overview of the division's organizational structure. Please include appropriate organizational charts.

**AG Response:**

The CAD consists of six members, listed in order of seniority, and two vacant positions:

- Deputy Attorney General (1)
- Senior Counsel/Team Leader (1)
- Assistant Attorney General (2 filled; 1 vacant)
- Financial Analyst (1 vacant)
- Paralegal/Accounting Analyst (1)
- Administrative Secretary (1)

The Attorney General, the Chief Deputy Attorney General, and a Senior Deputy Attorney General oversee the CAD. See the attached organizational chart (Exhibit 2).

The Deputy Attorney General position and one Assistant Attorney General position are not funded through the CAD's appropriation because the individuals in those positions spend time working on non-Consumer Advocate matters. These two positions are funded through general state funds appropriated to the Attorney General's Office.

5. What were the division's major accomplishments during fiscal year 2015 and to date in fiscal year 2016? Specifically address the major accomplishments of the division as it carried out its assigned duties, including information about the process for selecting cases, the number and type of cases handled by the division, and the resolution of those cases.

**AG Response:**

All of the accomplishments listed below are directly related to the CAD's statutory duty to represent the interests of Tennessee consumers with respect to public utilities services.

Case selection: The CAD typically does not initiate proceedings but responds to utilities' petitions that are filed with the TRA. The CAD monitors the TRA's website daily for new petitions. The CAD attorneys analyze each new petition to determine whether intervention by the CAD is appropriate based on the amount of money at issue,

the number of consumers affected, the policy issues involved, and other factors that may affect consumers' interests. Upon determining that action is appropriate, the CAD prepares a memorandum for the Attorney General recommending how to proceed. The Attorney General ultimately determines whether the CAD will intervene in a case or take other action.

**Number and types of cases:** The CAD has been involved in cases that include general rate cases, alternative ratemaking proceedings, licensing decisions, and other utility financing matters. During this period, the CAD intervened in 32 cases, and the TRA denied CAD intervention in one case. The CAD made formal filings but did not intervene in three cases. The CAD participated in 34 cases that reached a resolution during this period. At present, the CAD is a party in 14 open cases. Rarely, the CAD will appear before the Tennessee Court of Appeals to appeal a TRA order. The CAD is currently representing Tennessee consumers in a receivership proceeding in Cumberland County Chancery Court that the TRA filed in response to a utility's illegal activity. Finally, the CAD is occasionally involved with Attorney General investigations that implicate utility services.

**Resolution of cases:** The 34 cases that were resolved in this period resulted in monetary and non-monetary benefits for consumers. Total savings equaled \$13,605,936 (see Response 17 for a discussion of savings calculations). Non-monetary benefits included improved environmental and operational reporting requirements (Docket 15-00025: Tennessee Wastewater Systems, Inc.), protection from potentially deceptive advertising (Docket 15-00064: Kingsport Power Co.), and the preservation of competitive markets (consolidated Dockets 14-00086 and 14-00087: Piedmont Natural Gas Co.).

#### **Specific Accomplishments:**

- The CAD successfully resolved the first utility rate case involving an alternative regulatory method ("ARM") under Tenn. Code. Ann. § 65-5-103(d). The General Assembly enacted § 103(d) in 2013 to allow utilities to file for alternative rate reviews in lieu of a general rate case. Atmos Energy Corp. ("Atmos") was the first utility to petition for an ARM mechanism (Dockets 14-00030 and 14-00146). The CAD worked extensively with Atmos throughout 2014 and 2015 to design ratemaking methodologies that would satisfy the statutory criteria and ensure consumer protections into the future. The CAD successfully worked with utilities to effectuate the General Assembly's mandate while protecting consumer interests.
- The CAD intervened in the first electric rate case before the TRA in 20 years. Kingsport Power Company ("Kingsport Power"), the only major electric utility that the TRA regulates, filed a general rate case in late 2015 requesting an additional \$12.1 million in annual revenues (Docket 15-00093). Following informal conversations with the CAD, Kingsport Power withdrew its rate case and re-filed a similar rate case in early 2016 (Docket 16-00001). The CAD

pursued extensive discovery and developed robust expert testimony in this matter to challenge this significant rate increase. This matter also involves novel policy issues of first impression in Tennessee, such as the role of solar power in our energy landscape. The CAD is developing a complete rate and policy recommendation to assist the TRA in shaping sound rate design for Tennessee's residential and business consumers.

- The CAD developed an active relationship with the Tennessee Department of Environment and Conservation ("TDEC") in response to recent cases that present pressing environmental concerns (e.g., Docket 14-00136, "Petition of Tennessee Wastewater Systems, Inc., for Approval of Capital Improvement Surcharges and Financing Arrangements"). Increased collaboration with TDEC has allowed the CAD to better understand utilities' development proposals, engineering plans, and infrastructure improvement needs. These insights have improved the CAD's ability to assess the relationships between consumers' interests in environmentally sound utility service and low utility rates, and to help resolve matters to protect both interests.
  - The CAD was involved in an investigation with the Attorney General's Consumer Protection team and the TRA that focused on violations of the Do-Not-Call Registry in Tennessee. This joint work fell within the CAD's statutory authority because Do-Not-Call violations are regulated by the TRA and the Attorney General via the federal Telemarketing Sales Rule and the Tennessee Consumer Protection Act. The TRA Enforcement Division and the CAD worked together to address the entities' desire to resolve all claims. The matter is pending TRA deliberations.
  - The CAD has expanded its expert portfolio to address increasingly complex proceedings at the TRA. Alternative ratemaking has ushered in a new era of accounting-based litigation that requires the development of ratemaking methodologies that will outlast any given rate case. Regulatory accounting experts are indispensable. The CAD has expanded its reliance on one expert accountant to include another regulatory accounting firm. This expansion gives the CAD more expert resources to assess utilities' petitions, develop competing rate proposals, and negotiate settlements based upon accounting methodologies.
6. What has been the total amount of savings provided to consumers related to the work of the division in fiscal year 2015 and to date in fiscal year 2016?

**AG Response:**

FY 2015 = \$9,583,361  
FY 2016 (to date) = \$4,022,575  
Total = \$13,605,936

**These funds represent the money that utility consumers save as a result of the CAD's**

legal action. This total does not include recurring savings that resulted from legal action in prior fiscal years. See Response 17 for a discussion of savings calculations and the distinction between one-time savings and recurring savings.

7. Are staffing levels sufficient to fulfill the responsibilities of the division? If no, what additional staffing is needed?

**AG Response:**

No, the CAD is currently interviewing applicants to fill an attorney vacancy and a regulatory analyst vacancy. It is especially challenging to fill the regulatory analyst vacancy because the position requires a unique set of skills and experience. Without an internal employee to fill that role, the CAD relies heavily on outside regulatory accounting experts. While outside expert contracts would be necessary even if the CAD had a regulatory analyst on staff, hiring a qualified staff member would decrease the CAD's overall outside expert expense. If workloads continue at their current pace and if these two vacancies are filled, the CAD anticipates that staffing levels will be sufficient.

8. In addition to Tennessee, how many states have a consumer advocate division/function? How many states locate their consumer advocate within the Office of the Attorney General?

**AG Response:**

Not including Tennessee, 45 other states have a consumer advocate function. Eighteen other states locate the consumer advocate function in the Office of the Attorney General, four other states have a non-profit and non-governmental consumer advocate function, and the remaining states carry out consumer advocate functions through a separate governmental agency.

9. Provide a description of the relationship between the Consumer Advocate Division and the Tennessee Regulatory Authority.

**AG Response:**

The CAD and the TRA serve fundamentally different purposes and operate under distinct statutory schemes. The statutory schemes anticipate independence of the two entities and that independence benefits the regulatory process.

The TRA has broad jurisdiction to regulate investor-owned utilities that operate throughout Tennessee. Through its regulation, the TRA seeks to balance the interests of utilities, consumers, and the State. In TRA proceedings, utilities advocate for their own interests. To balance the proceedings, the General Assembly established the CAD to advocate for consumers' interests. The CAD thus presents legal, financial, and policy analysis that affords the TRA a consumer perspective that differs from the utilities' positions. A more thorough presentation of the consumer interests at stake allows the TRA to achieve better regulatory results. The CAD nonetheless has active and ongoing communications with utility representatives since understanding the industry's perspective is a vital component of ensuring consumers receive effective services at a fair

rate. The CAD staff likewise attends relevant forums to obtain relevant information on evolving industry standards.

10. What reports does the division prepare on its operations, activities, and accomplishments? Who receives these reports?

**AG Response:**

- **Fiscal Results Report:** This report shows the monetary benefits that the CAD has achieved for consumers. The Attorney General, Chief Deputy Attorney General, and Senior Deputy Attorney General receive this report at least four times per year. The Attorney General reports the CAD's total savings to the General Assembly at the end of each fiscal year as part of the Attorney General's annual report.
- **Full Case Report:** This confidential report shows the cases that the CAD is monitoring or in which the CAD is involved. The Attorney General, Chief Deputy Attorney General, and Senior Deputy Attorney General receive this report at least twice per year.
- **Significant Case Report:** This confidential report shows the significant cases in which the CAD is involved. A case may be significant because of the amount of money involved, the number of consumers impacted, the State policy interests involved, or other aspects that the CAD or the Attorney General deems noteworthy. The Attorney General, Chief Deputy Attorney General, and Senior Deputy Attorney General receive this report at least twice per year.

11. Describe any items related to the division that require legislative attention and your proposed legislative changes.

**AG Response:**

None.

12. Should the division be continued? To what extent and in what ways would the absence of the division endanger the public health, safety, or welfare?

**AG Response:**

Yes. The CAD, as the General Assembly intended, provides vital advocacy for Tennessee ratepayers and produces significant savings and non-monetary benefits for Tennessee consumers. Forty-five (45) other states have a governmental unit similar to the CAD, thus Tennessee is in line with how the vast majority of other states ensure consumer representation in rate-making and other hearings.

Terminating the CAD would defeat the General Assembly's goal of providing Tennessee consumers a voice in ratemaking proceedings. Without the CAD's effective advocacy for

Tennessee consumers, no party would be present in ratemaking proceedings to hold utilities accountable. Without such oversight and advocacy by the CAD, potentially millions of dollars from Tennessee citizens could be inappropriately transferred to the shareholders of investor-owned utilities. Investor-owned utilities function like monopolies. While the TRA is tasked with regulating these utilities to prevent market abuses, the CAD plays a critical role in that regulation.

The TRA considers consumers' interests as part of its overall assessment, but the CAD specifically *advocates* for those interests. Utility consumers, especially residential consumers, are a diffuse group who usually lack the incentives and ability to advocate on their own behalf. For example, a large utility may request a rate increase of several million dollars that results in a nominal monthly increase in consumers' monthly bills. Therefore, it is prohibitively costly for any consumer to hire counsel and litigate to save a few dollars a month. But the aggregate effect of these small increases is a substantial total cost to Tennesseans. The CAD, therefore, advocates for consumers in the aggregate to prevent undue utility gains.

State industry and businesses also benefit from the CAD's advocacy. Firms pay attention to utility rates as important costs of doing business. Reasonable utility rates that provide reliable and sustainable services will continue to attract new business investment to Tennessee, while unreasonable rates would deter it. Thus, the CAD's activity encourages economic growth and helps Tennessee maintain its advantage as the state competes for business investment.

The CAD advocates for and protects consumers' non-monetary interests. Terminating the CAD could result in improper utility licensing or environmental abuses. For example, the CAD participates in licensing proceedings in which a utility must prove that it possesses various capabilities necessary to operate. Consumers have an interest in ensuring that only qualified utilities receive monopoly rights to operate in Tennessee. The CAD helps the TRA fully assess utilities' qualifications.

The CAD's advocacy directly benefits the TRA staff and directors. The CAD engages in substantial discovery and presents extensive expert testimony. These resources provide the TRA with a robust and dynamic assessment of the interests at stake in each proceeding. Terminating the CAD would unduly hamper the TRA, which relies on the CAD to develop proof that enables more equitable regulation and better informed decision-making.

### ***Performance Measurement***

13. Has the division developed and implemented quantitative performance measures for ensuring it is meeting its goals? (Please answer either yes or no). If the division has developed and implemented quantitative performance measures, answer questions 14 through 21. If the division has not developed quantitative performance measures, proceed directly to question 22.

**AG Response:**

**Yes.**

14. What are your key performance measures for ensuring the division is meeting its goals? Describe so that someone unfamiliar with the program can understand what you are trying to measure and why it is important to the operation of your program.

**AG Response:**

**The CAD's quantitative performance metric is consumer savings. To fulfill the statutory duty to protect consumers' interests, the CAD strives to achieve monetary and non-monetary benefits for consumers. Only the monetary benefits are quantifiable. The consumer-savings metric quantifies the money that consumers do not have to spend as a result of CAD action. While consumers may not see a decrease in utility rates, they often experience a lesser increase in utility rates than the increase the utility originally sought.**

**Consider the following example: A utility petitions the TRA for a \$10 million rate increase. The CAD intervenes in the matter, conducts discovery, files expert testimony, and otherwise assesses the propriety of the rate increase. From its review, the CAD determines that a \$1 million increase is appropriate. After conducting a hearing and reviewing proof, the TRA orders a \$3 million rate increase. The result of the litigation is a rate increase that is \$7 million *less* than the increase that the utility requested. The CAD measures this as \$7 million in consumer savings.**

**Consumer savings are directly attributable to the CAD's involvement. The CAD presents a completely alternate rate recommendation than the utility presents. The CAD recommendation includes ample discovery, expert testimony about accounting methodologies and appropriate rates of return, and a thorough analysis of the utility's policies and financial position. The TRA relies on the CAD's proof to achieve equitable ratemaking; therefore, the CAD's presentation of an alternate rate recommendation directly contributes to consumer savings.**

15. What aspect[s] of the division's programs are you measuring?

**AG Response:**

**The CAD is measuring its effect on consumers' monetary interests. See Response 14 for an explanation of this metric.**

16. Who collects relevant data and how is this data collected (e.g., what types information systems and/or software programs are used) and how often is the data collected? List the specific resources (e.g., report, other document, database, customer survey) of the raw data used for the performance measure.

**AG Response:**

**The CAD attorneys collect relevant data from TRA's website and from docket filings that the CAD receives in the normal course of litigation. The TRA website has a database**



of every active case (which the TRA designates “dockets”) and provides a link to each filing in the docket. If the CAD is a party in a docket, then the CAD attorney(s) assigned to that docket receives a copy of each docket filing before they are posted on the TRA website.

The raw data are the original petition in the docket and the order that the TRA ultimately issues. These data elements are collected as soon as the petition and order become part of the docket record. The timing of this process varies with each docket. The raw data consist of quantitative and qualitative features. CAD employs an internal database to track those features and calculate savings in accordance with the procedures described in Response 17.

17. How is the actual performance measure calculated? If a specific mathematical formula is used, provide it. If possible, provide the calculations and supporting documentation detailing your process for arriving at the actual performance measure.

**AG Response:**

The process for calculating consumer savings is the same process that the CAD had in place during the 2014 audit. Generally, the metric equals the rate increase that the utility requested minus the rate increase that the TRA ordered. Savings calculations vary based on the unique circumstances of each case. No perfect method exists for calculating savings. The general procedures that the CAD uses for calculating savings in a given case are described below. These procedures reflect a desire for both accuracy and ease of calculation. For example:

- **Timing of reports:** Savings are reported in the year when the TRA Directors make a final oral ruling. For example, if the Directors issue a final oral ruling in 2015 but do not issue a final written order until 2016, the customer savings from that case will be reported as 2015 savings. This calculation reflects that parties act according to the oral ruling upon its issuance and written orders are often delayed.
- **Recurring rate increase:** If a utility requests a general rate increase of \$5 million annually and the TRA orders only a \$3 million annual rate increase, then \$2 million in savings will be repeated each year in the customers’ rates until a future general rate case. In this scenario, the CAD calculates savings equal to \$2 million. This is a conservative estimate because consumers will continue to reap \$2 million *each year* until the utility files another general rate case. The real value of the \$2 million will decrease each year, however, because of inflation. The CAD cannot accurately forecast the utility’s future decisions or future economic conditions; therefore, the savings metric reflects only the certain savings that consumers will realize in the first year after the rate case.
- **Lump-sum rate increase:** If a utility filed a petition to recover \$1 million of extraordinary expenses related to flood damages and the TRA allowed a recovery of \$700,000 over two years, then there is a savings of \$300,000. The \$300,000

savings would be reflected in customers' rates at \$150,000 per year for two years. In this scenario, the CAD would calculate savings equal to \$300,000, an exact number.

- When savings accrue over a definite period of time, the CAD reports all of the savings in the period when the TRA ordered the result—i.e., \$300,000 savings in year 1, rather than \$150,000 in year 1 and \$150,000 in year 2. This choice is appropriate to match the total savings result with the CAD's activity in the corresponding year: the CAD's work in year 1 resulted in the entire \$300,000 savings.
- **Withdrawn utility petition:** The CAD will calculate savings from a withdrawn petition depending on the unique circumstances of the case. Relevant considerations include the CAD's involvement with the case prior to the withdrawal, whether the company will re-file a petition seeking substantially similar relief, and the time between the withdrawal and re-filing.
- **Refunds to ratepayers/consumers:** Savings based on a utility's request to refund customers have both a time and a value component. Because of the time value of money, it may be preferable for customers to receive the same or slightly less money over a shorter period. Savings are calculated over the period when the refund is paid to customers, which eliminates the need to assume the appropriate discount rate. Hypothetical examples:
  - Company requests to refund customers \$1 million over years 1-2 (\$500,000/year). Company settles to refund \$1 million over year 1. Customers receive an extra \$500,000 in year 1, which is the only year of the refund. Thus, the savings are \$500,000.
  - Company requests to refund customers \$1 million over years 1-5 (\$200,000/year). Company settles to refund \$800,000 over years 1-2. Customers receive \$800,000 over years 1-2, the life of the refund, rather than \$400,000. Thus, the savings are \$400,000.

18. Is the reported performance measure result a real number or an estimate? If an estimate, explain why it is necessary to use an estimate. If an estimate, is the performance measure result recalculated, revised, and formally reported once the data for an actual calculation is available?

**AG Response:**

Some cases generate an exact number; others generate an estimate. Therefore, the aggregate metric is an estimate. Estimates are necessary to accommodate the unique scenarios of each case, as described in Response 17. Additional data that would allow for an exact calculation is not available. In many cases, such additional data is subject to protective orders or other trade-secret protections.

19. Who reviews the performance measures and associated data/calculations? Describe any process to verify that the measure and calculations are appropriate and accurate.

**AG Response:**

**The Deputy Attorney General reviews the CAD's savings reports and associated data/calculations. The CAD maintains a record showing how the savings were calculated. After the Deputy Attorney General verifies the accuracy of these calculations, the Attorney General and other senior staff review the CAD savings reports.**

20. Are there written procedures related to collecting the data or calculating and reviewing/verifying the performance measure? Provide copies of any procedures.

**AG Response:**

**No. As explained in Response 17, general calculation guidelines exist, but each case is unique. A written policy cannot be established because the policy would be unable to effectively address the myriad considerations that affect a savings calculation. The CAD staff meets internally to discuss the appropriate savings calculation for each case. When estimates are necessary, the CAD follows a conservative approach that is more likely to underestimate savings than overestimate savings.**

21. Describe any concerns about the division's performance measures and any changes or improvements you think need to be made in the process.

**AG Response:**

**None.**

22. Please list all division programs or activities that receive federal financial assistance and, therefore are required to comply with Title VI of the Civil Rights Act of 1964. Include the amount of federal funding received by program/activity.

**AG Response:**

**None.**

***If the division does receive federal assistance, please answer questions 23 through 30. If the division does not receive federal assistance, proceed directly to question 29.***

23. Does your division prepare a Title VI plan? If yes, please provide a copy of the most recent plan.

**N/A**

24. Does your division have a Title VI coordinator? If yes, please provide the Title VI coordinator's name and phone number and a brief description of his/her duties. If not, provide the name and phone number of the person responsible for dealing with Title VI issues.

N/A

25. To which state or federal division (if any) does your division report concerning Title VI? Please describe the information your division submits to the state or federal government and/or provide a copy of the most recent report submitted.

N/A

26. Describe your division's actions to ensure that division staff and clients/program participants understand the requirements of Title VI.

N/A

27. Describe your division's actions to ensure it is meeting Title VI requirements. Specifically, describe any division monitoring or tracking activities related to Title VI, and how frequently these activities occur.

N/A

28. Please describe the division's procedures for handling Title VI complaints. Has your division received any Title VI-related complaints during the past two years? If yes, please describe each complaint, how each complaint was investigated, and how each complaint was resolved (or, if not yet resolved, the complaint's current status).

N/A

29. Please provide a breakdown of current division staff by title, ethnicity, and gender.

**AG Response:**

<b>Deputy Attorney General</b>	<b>White</b>	<b>Female</b>
<b>Senior Counsel/Team Leader</b>	<b>White</b>	<b>Male</b>
<b>Assistant Attorney General</b>	<b>White</b>	<b>Male</b>
<b>Assistant Attorney General</b>	<b>White</b>	<b>Female</b>
<b>Assistant Attorney General</b>	<b>Vacant</b>	<b>Vacant</b>
<b>Paralegal</b>	<b>White</b>	<b>Male</b>
<b>Administrative Secretary</b>	<b>White</b>	<b>Female</b>
<b>Financial Regulatory Analyst</b>	<b>Vacant</b>	<b>Vacant</b>

30. Please list all division contracts, detailing each contractor, the services provided, the amount of the contract, and the ethnicity of the contractor/business owner.

**AG Response:**

**See attached chart (Exhibit 3).**

**Attorney General's Office**  
**303.01.12 C Advocate Pub Utilities**  
**Financial Status**  
**FY 16 Actual Expenditures Thru 03/31/16**

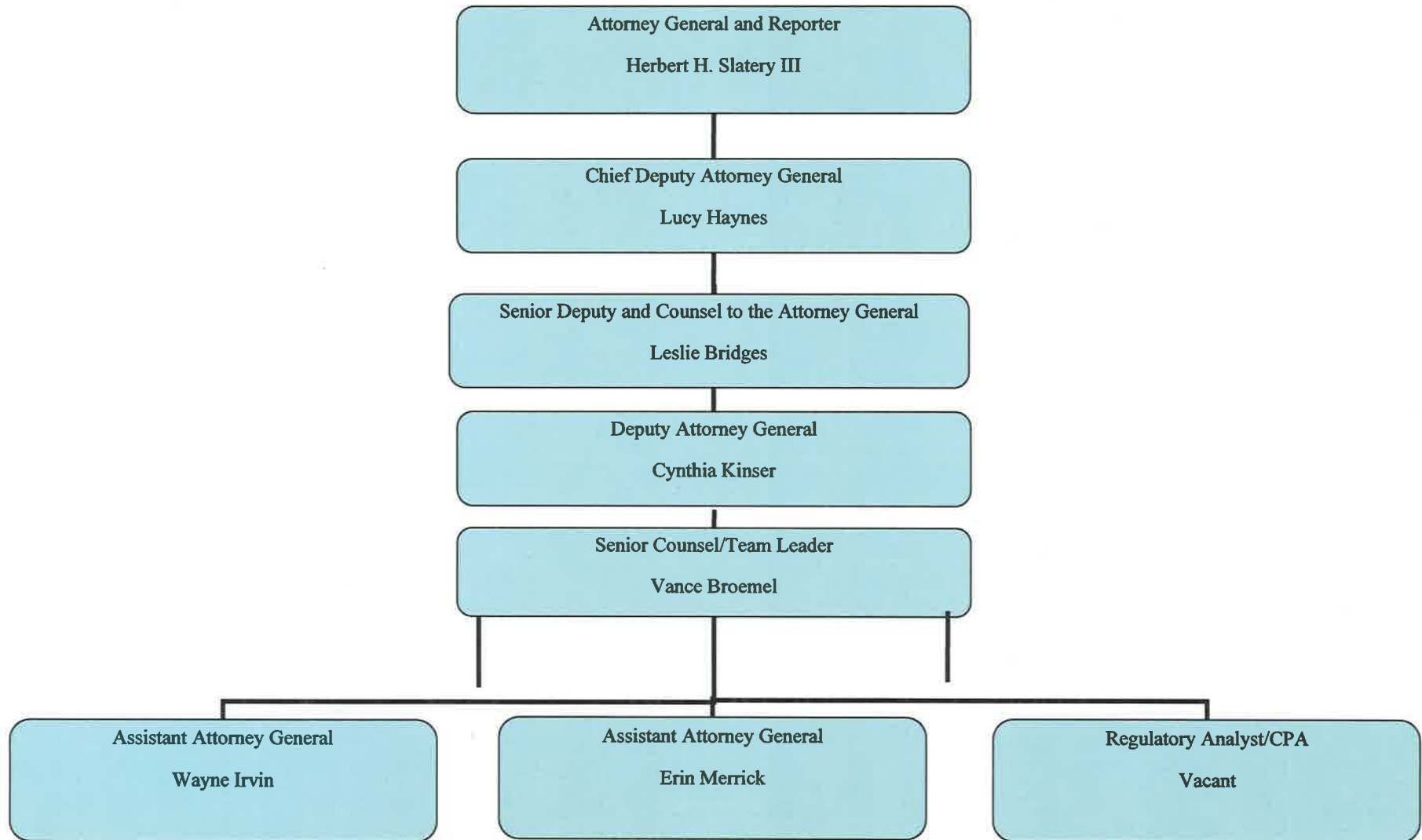
	<b>FY 16</b> <b>Actual Exp Thru</b> <b>03/31/16</b>
<b>Expenditures:</b>	
Salary	205,700
Longevity	3,500
Overtime	0
Total Payroll	209,200
Benefits	85,800
Total Benefits	85,800
Total Personnel	295,000
Travel	9,800
Printing	0
Utilities and Fuel	0
Communications	1,400
Maintenance and Repairs	300
Professional Services Third Party	126,600
Supplies	1,700
Rentals and Insurance	1,100
Awards	0
Grants and Subsidies	0
Unclassified (Prof Priv Tx)	0
Equipment	0
Training	2,100
Computer Related	11,800
Professional Services State Agencies	46,400
Total Other	201,200
<b>Total Expenditures</b>	<b>496,200</b>
<b>Funding:</b>	
Appropriation	496,200
AG Reserve	0
Current Services	0
Interdepartmental	0
Component (BOR, etc.)	0
<b>Total Funding</b>	<b>496,200</b>

**Attorney General's Office**  
**303.01.12 C Advocate Pub Utilities**  
**Financial Status**  
**June 2015**

	<b>FY 15</b>
	<b>Actual Exp Thru</b>
<b>Expenditures:</b>	<b>6/30/15</b>
Salary	323,500
Longevity	3,800
Overtime	0
Total Payroll	327,300
Benefits	128,100
Total Benefits	128,100
Total Personnel	455,400
Travel	18,300
Printing	100
Utilities and Fuel	0
Communications	1,700
Maintenance and Repairs	0
Professional Services Third Party	143,700
Supplies	4,100
Rentals and Insurance	1,700
Awards	0
Grants and Subsidies	0
Unclassified (Prof Priv Tx)	1,200
Equipment	0
Training	5,900
Computer Related	11,200
Professional Services State Agencies	58,100
Total Other	246,000
<b>Total Expenditures</b>	<b>701,400</b>
<b>Funding:</b>	
Appropriation	701,400
AG Reserve	0
Current Services	0
Interdepartmental	0
Component (BOR, etc.)	0
<b>Total Funding</b>	<b>701,400</b>

# Consumer Advocate

## Organizational Chart



Contractor	Services	Amount of Contract	Ethnicity
<b>Larkin &amp; Associates, PLLC</b> <b>Certified Public Accountants And Regulatory Consultants</b> <b>15728 Farmington Road</b> <b>Livonia, Michigan 48154</b>	<b>Regulatory Analysts/Accountants</b> <ul style="list-style-type: none"> <li>· Analysis of utilities' filings, preparation of interrogatories and participation in other discovery activities.</li> <li>· Preparation of responses to interrogatories propounded upon the CAD by other parties.</li> <li>· Analysis of utilities' direct and rebuttal testimony, assistance in preparing cross-examination questions, and attendance during cross-examination.</li> <li>· Preparation and submission of direct testimony.</li> <li>· Offer live testimony and be subject to live cross-examination during hearings.</li> <li>· Analysis of utilities' compliance with tariffs to determine conformity with the TRA's orders.</li> </ul>	\$31,900	Unknown; this contractor is a firm with multiple employees
<b>Hal Novak, CPA</b> <b>WHN CONSULTING</b> <b>19 Morning Arbor Place</b> <b>The Woodlands, TX 77381</b>	<b>Regulatory Analyst/Accountant</b> <ul style="list-style-type: none"> <li>· Same as above.</li> </ul>	\$110,000	White
<b>Christopher C. Klein, Ph.D.</b> <b>Professor, Economics and Finance Department</b> <b>Middle Tennessee State University</b> <b>1301 East Main Street</b> <b>Murfreesboro, TN 37132</b>	<b>Regulatory Economist</b> <ul style="list-style-type: none"> <li>· Same as above, with a focus on rate-of-return analysis.</li> </ul>	\$24,000	White